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EDWIN ANGULO
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 EDWIN ANGULO,

15 Defendant.
16

Case No. 1:24-cr-00069-JAM-BAM

**MOTION TO AMEND PRESENTENCE
INVESTIGATION REPORT (FINAL);
ORDER**

17 The draft Presentence Investigation Report (PSR) was filed in this matter on February 6,
18 2025. *See* ECF #30. Mr. Angulo submitted his informal objections to the draft PSR on February
19 11, 2025. *See* ECF #31-2. In his informal objections, Mr. Angulo objected to paragraph 20 of the
20 draft PSR insofar as it included the improper addition of two levels under the U.S. Sentencing
21 Guidelines § 2A6.2(b)(1)(A) for the offense involving the violation of a court protective order. *See*
22 ECF #31-2 at 2. The final PSR was filed in this matter on February 19, 2025. *See* ECF #31. On
23 February 25, 2025, Mr. Angulo filed his formal objections to the PSR and continued his objection
24 to the addition of two levels under § 2A6.2(b)(1)(A), still listed in paragraph 20 of the final PSR.
25 *See* ECF # 32 at 3-4.

26 At sentencing on March 11, 2025, the Court sustained the objection to paragraph 20 insofar
27 as it added an additional two levels under the U.S. Sentencing Guidelines § 2A6.2(b)(1)(A). As a
28 result, it is necessary to amend a number of paragraphs in the final PSR to reflect the sustained

1 objection to paragraph 20 of the final PSR. It is necessary to amend paragraph 20 to only include
2 an additional two levels of § 2A6.2(b)(1)(E) but removing the addition of two levels under
3 (b)(1)(A). It is necessary to correct paragraph 28, which lists the total offense level as 19; the total
4 offense level found by the Court at sentencing is 17. It is necessary to correct paragraph 75 which
5 details the guideline provisions; this paragraph should read that the total offense level is 17 and
6 the guideline imprisonment range is 30-37 months. It is necessary to correct the offense level and
7 the guideline provision, as well as the recommended sentence, included on page 1 of ECF # 31-1,
8 which incorrectly lists the total offense level at 19 and the guideline range as 37-46 months, as
9 well as the two references on page 2 of ECD # 31-1 listing the low-end of the guideline /
10 recommendation for imprisonment as a term of 37 months.

11 The government does not oppose modifying the PSR to reflect the above changes.

12 Respectfully submitted,

13 HEATHER E. WILLIAMS
14 Federal Defender

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16 Date: March 14, 2025

/s/ Kara R. Ottervanger
KARA R. OTTERVANGER
Assistant Federal Defender
Attorney for Defendant
EDWIN ANGULO

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20 **ORDER**

21 IT IS HEREBY ORDERED that the final Presentence Investigation Report filed on
22 February 19, 2025, be **MODIFIED** in accordance with the above.

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24 Dated: March 17, 2025

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE